UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TENNESSEE MEMPHIS DIVISION

In Re: Case No. 20-21397

WILLIE JAMES LOTT, SR.,

Chapter 13

DEBTOR(S).

OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION REGARDING REAL PROPERTY LOCATED AT 18 EAST MITCHELL RD, MEMPHIS, TENNESSEE 38109

COMES NOW Wells Fargo Bank, N.A., for just cause, and files this written objection to confirmation pursuant to 11 USC § 1324. Wells Fargo Bank, N.A. objects and asks that a hearing be held and for grounds says that the plan does not include mortgage arrears, despite arrears being owed in the approximate amount of \$7,694.11; and the plan improperly treats the escrow as an unsecured debt.

WHEREFORE, PREMISES CONSIDERED, Creditor prays:

- 1. That confirmation be denied.
- 2. That Wells Fargo Bank, N.A. be awarded its attorney fees and costs incurred in this action.
- 3. For any and all further relief to which it may be entitled.

Respectfully submitted,

/s/ Jordan Anderson

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection to Confirmation has been electronically served or mailed, postage prepaid on March 9, 2020

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Willie James Lott Sr. 18 E. Mitchell Rd Memphis, TN 38109

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/s/ Jordan Anderson

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